

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES  
PRACTICES, AND PRODUCTS  
LIABILITY LITIGATION**

***THIS DOCUMENT RELATES TO  
ALL CASES***

**Case No. 3:16-md-2738-MAS-RLS**

**MDL Case No. 2738**

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**PLAINTIFFS' STEERING COMMITTEE'S MOTION TO SEAL  
EXHIBIT 4 TO SUPPLEMENTAL BRIEF IN SUPPORT OF  
MOTION TO QUASH OR FOR PROTETIVE ORDER REGARDING  
SUBPOENA DIRECTED AT KCIC, LLC**

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Pursuant to Rule 5(d) of the Federal Rules of Civil Procedure and Local Civil Rules 5.3(c) and 7.1, Plaintiffs, by and through Plaintiffs' Steering Committee ("PSC"), hereby move to file Exhibit 4 to the Declaration of Michelle A. Parfitt, submitted in support of the PSC's Supplemental Brief in Support of Motion to Quash or for Protective Order Regarding Subpoena Directed at KCIC, LLC (ECF No. 29596) under seal.

The PSC has asserted the mediation privilege with respect to the KCIC documents at issue in the Motion to Quash and listed on the privilege log, and information on the privilege log itself constitutes privileged and confidential

attorney work product. Therefore, the PSC moves the Court for leave to submit Exhibit 4 to the Declaration of Michelle A. Parfitt under seal.

A Proposed Order is simultaneously submitted with this Motion.

Dated: March 15, 2024

Respectfully submitted,

/s/ Michelle A. Parfitt

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***Plaintiffs' Liaison Counsel***

**CERTIFICATE OF SERVICE**

I hereby certify that on March 15, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive services in this MDL.

Respectfully submitted,

/s/ Michelle A. Parfitt  
Michelle A. Parfitt